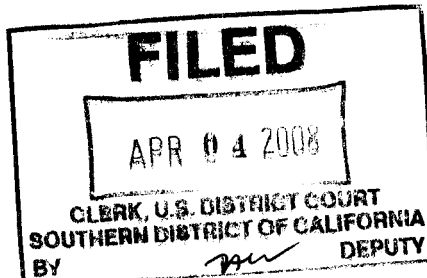


W  
AUSN



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8295

UNITED STATES OF AMERICA,

Plaintiff,

v.

Ismael BRAMBILA-Maravilla

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF


21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)


The undersigned complainant being duly sworn states:

That on or about April 3, 2008, within the Southern District of California, defendant Ismael BRAMBILA-Maravilla did knowingly and intentionally import approximately 69.74 kilograms (153.42 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
BRANDON M. WOOD  
Special Agent  
U.S. Immigration & Customs  
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 4th,  
DAY OF APRIL 2008.

  
PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Ismael BRAMBILA-Maravilla

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes  
6 furnished to U. S. Immigration and Customs Enforcement Special Agent Brandon  
7 Wood.

8 On April 3, 2008, at approximately 1736 hours, Ismael BRAMBILA-Maravilla  
9 entered the United States at the Calexico, California West Port of Entry (POE).  
10 BRAMBILLA was the driver and sole occupant of a 2001 Ford Ranger with Mexican  
11 license plate number BM50382.

12 Customs and Border Protection Officer (CBPO) M. Aguilar was manning primary  
13 lane number eight (8) when the vehicle BRAMBILLA was driving approached his lane.  
14 CBPO M. Aguilar noticed a bulge on the outside of the front right tire. CBPO M. Aguilar  
15 identified BRAMBILLA from his DSP-150 and received a negative Custom's declaration  
16 from BRAMBILLA. BRAMBILLA stated to CBPO M. Aguilar that the vehicle was his.  
17 CBPO M. Aguilar noticed that BRAMBILLA's hand was shaking. CBPO M. Aguilar  
18 struck the rear tire and noticed that it sounded solid. CBPO M. Aguilar also noticed that  
19 the tire with the bulge was leaking air and the tire also sounded solid when tapped.  
20 CBPO M. Aguilar referred the vehicle to the vehicle secondary lot for a more intensive  
21 inspection.

22 Customs and Border Protection Canine Officer (CEO) E. Smura was conducting  
23 a lot sweep with his Human-Narcotics Detector Dog (HNDD) when his HNDD alerted to  
24 the 2001 Ford Ranger being driven by BRAMBILLA in the vehicle secondary lot. The  
25 HNDD alerted to the front driver's side tire. CEO E. Smura notified CBPO J. Esparza of  
26 the alert to the vehicle.

27 CBPO J. Esparza conducted a more intensive examination of the vehicle which  
28 revealed packages in all four tires. A package was probed which produced a green  
29

1 leafy substance that tested positive for marijuana. The total weight of the packages was  
2 69.74 kilograms (153.42 pounds).

3 Special Agent B. Wood placed BRAMBILLA under arrest for violation of Title 21,  
4 United States Codes, 952 and 960, Importation of a Controlled Substance. BRAMBILLA  
5 was advised of his Constitutional Rights, per Miranda, which he acknowledged and waived.

6 BRAMBILLA admitted knowledge that a controlled substance was concealed within  
7 the vehicle. BRAMBILLA stated to Agent Wood that the smuggling organization had paid  
8 him \$1,000.00 and was going to pay him another \$3,000.00 to smuggle the controlled  
9 substance into the United States and drop it off at a local "Pep-Boys".  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28